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17 TESLA, INC., ELON MUSK, BRAD W. BUSS,
18 ROBYN DENHOLM, IRA EHRENPREIS,
19 ANTONIO J. GRACIAS, JAMES MURDOCH,
20 KIMBAL MUSK, and LINDA JOHNSON RICE

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE TESLA, INC. SECURITIES
LITIGATION

Case No. 3:18-cv-04865-EMC

STIPULATION AND [PROPOSED]
ORDER EXTENDING TIME FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL (ECF
NO. 351)

1 Pursuant to Northern District of California Civil Local Rules 6-1 and 6-2, Defendants Tesla,
2 Inc., Elon R. Musk, Brad W. Buss, Robyn Denholm, Ira Ehrenpreis, Antonio J. Gracias, James
3 Murdoch, Kimbal Musk, and Linda Johnson Rice (collectively, “Defendants”), by and through their
4 undersigned counsel of record, submit the following stipulation and proposed order:

5 WHEREAS, on December 16, 2021, Defendants substituted their counsel to the firm of
6 Quinn Emanuel Urquhart & Sullivan, LLP. (ECF No. 350);

7 WHEREAS, counsel for Defendants have been working diligently to fully complete this
8 transition and become familiarized with all issues in this case, including open discovery disputes
9 between the parties, and in particular those that relate to confidentiality designations;

10 WHEREAS, on January 11, 2022, Plaintiff Glen Littleton (“Lead Plaintiff”), filed a Partial
11 Motion for Summary Judgment (ECF No. 352) and an Administration Motion to File Under Seal
12 (ECF No. 351) (“Motion to Seal”);

13 WHEREAS, the Northern District of California’s Civil Local Rule 79-5(f)(3) requires that
14 Defendants respond to the Motion to Seal in 7 days, or by January 18, 2022;

15 WHEREAS, given the amount of confidential and highly confidential material that has been
16 filed by Plaintiff in support of his Motion for Partial Summary Judgment, Defendants’ counsel
17 require additional time to familiarize themselves with and assess the content of these materials in
18 order to respond to the Motion to Seal;

19 WHEREAS, the parties have conferred and Lead Plaintiff does not object to the provision
20 of additional time for Defendants to respond to the Motion to Seal.

21 NOW, THEREFORE, Defendants request that the Court enter an order providing
22 Defendants with 14 days to respond to the Motion to Seal, such that a response would now be due
23 on **January 25, 2022**.

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1 Dated: January 14, 2022

LEVI & KORSINSKY, LLP

3 By: /S/ Adam Apton
4 Adam Apton

5 *Attorneys for Plaintiff and Counsel for the*
6 *Class*

7 Dated: January 13, 2022

8 QUINN EMANUEL URQUHART &
9 SULLIVAN, LLP

10 By: /S/ Michael T. Lifrak
11 MICHAEL T. LIFRAK

12 *Attorneys for Defendants*

13 * * * * *

14 I hereby attest that I obtained concurrence in the filing of this document from each of the
15 other signatories on this e-filed document.

16 Dated: January 14, 2022

17 QUINN EMANUEL URQUHART &
18 SULLIVAN, LLP

19 By: /S/ Michael T. Lifrak
20 MICHAEL T. LIFRAK

21 * * * * *

22 [PROPOSED] ORDER

23 PURSUANT TO THE TERMS OF THE ABOVE STIPULATION, it is so ORDERED.

24 Dated: January 18, 2022

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26 JUDGE EDWARD M. CHEN